

Taly Goody, Esq.
 Wyoming Bar No.: 8-6737
 Greyson M. Goody, Esq.
 GOODY LAW GROUP
 58 Malaga Cove Plaza
 Palos Verdes Estates, CA 90274
 Telephone: (310) 893-1983
 Email: taly@GoodyLawGroup.com
greyson@GoodyLawGroup.com

T. Michael Morgan, Esq*
 Florida Bar No.: 062229
 Rudwin Ayala, Esq*
 Florida Bar No.: 84005
 MORGAN & MORGAN, P.A
 20 N. Orange Ave, Suite 1600
 Orlando, FL 32801
 Telephone: (407) 420-1414
 Email: mmorgan@forthepeople.com
rayala@forthepeople.com

** Pro Hac Vice*

*Attorneys for
 Plaintiffs*

**UNITED STATES DISTRICT COURT
 IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH, Individually
 and as Parent and Legal Guardian of W.W.,
 K.W., G.W., and L.W., minor children, and
 MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
 ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

PLAINTIFFS' PROPOSED STIPULATIONS OF FACTS
PACKET #2:

Plaintiffs, by and through their undersigned counsel, hereby submit their proposed stipulation of undisputed facts, to which Defendants have not stipulated:

No.	Undisputed Fact	Source / Citation
1	Det. Sheaman's origin and cause investigation concluded that the fire originated at the hoverboard within Bedroom #4.	Sheaman Deposition 56:18-59:10; 117:22-118:8; 299:10-22; 301:10-20;

		314:5-315:7; 315:25-316:13.
2	No physical evidence exists of an improperly discarded cigarette causing the fire.	Filas Deposition 79:4-19; Gorbett Deposition 61:8-62:1 and 126:16-22.
3	G.W. and L.W.'s bunk bed was against the window in Bedroom #4.	Stephanie Wadsworth Deposition 65:21- 66:3
4	G.W. would sleep on the top bunk, and L.W. would sleep on the bottom bunk, including the day of the fire.	Stephanie Wadsworth Deposition 66:11-21
5	Neither G.W. nor L.W. suffered physical injuries related to the fire.	Stephanie Wadsworth Deposition 30:19-24
6	Jetson was aware of two complaints prior to February 2022 involving the Plasma Hoverboard and complaints of overheating or fire risk.	Husain Deposition 117:12-24
7	Even with UL testing and certification, Jetson Hoverboards can still pose a fire hazard due to overheating.	Husain Deposition 114:1-7
8	Following recall of the Rogue Hoverboard, Jetson did nothing to test the battery packs of other Hoverboards, including the Plasma to determine whether they also overheated or created a fire hazard.	Husain Deposition 113:7-114:16
9	Gorbett never went to the scene of the fire.	Gorbett Deposition 10:18-19
10	Gorbett never inspected physical evidence relating to the fire.	Gorbett Deposition 10:20-11:4
11	Filas relied on Strandjord's conclusions relating to arc mapping.	Filas Deposition 38:13-39:19; 40:10-17; 45:7-18
12	Filas relied on Gorbett for the fire modeling analysis and opinions.	Filas Deposition 52:5-23
13	If Dr. Gorbett or Mr. Strandjord failed to conduct a complete analysis of all available evidence within their field of specialty, that would amount to a failure to comply with NFPA 921.	Filas Deposition 54:24-55:5
14	Stephanie has a life-changing injury and there is a high likelihood that she will have symptoms related to tightness, itching, and appearance for the rest of her life.	LaChapelle Deposition 53:16-54:12
15	W.W. will require reevaluations on a fairly regular basis after he's received the maximal laser treatment due to likely development of scar contractures or issues related to mobility with joints as he grows, including potential scar releases or lasers as he gets closer to age 18.	LaChapelle Deposition 55:1-19
16	The arc mapping done for the Wadsworth residence was only as to Bedroom 4, not the rest of the house.	Strandjord Deposition 24:4-8; 46:23-47:2

17	Strandjord never attempted to search for arcing locations at the site before removal of the branch circuit.	Strandjord Deposition 47:17-21
----	-------------------------------------------------------------------------------------------------------------	-----------------------------------

Date: January 22, 2025.

Respectfully Submitted,

/s/ Rudwin Ayala

RUDWIN AYALA, Esq.*

Florida Bar No.: 84005

MORGAN & MORGAN, P.A

1700 Palm Beach Lakes Blvd, Suite 500

West Palm Beach, FL 33401

Telephone: (561) 764-2220

Emails: rayala@forthepeople.com

sleroy@forthepeople.com

Admitted Pro Hac Vice

And,

/s/ Taly Goody

TALY GOODY, ESQ.

Wyoming Bar No.: 8-6737

GREYSON M. GOODY,

ESQ. GOODY LAW

GROUP

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Emails: taly@GoodyLawGroup.com

greyson@GoodyLawGroup.com

Local Counsel

/s/ T. Michael Morgan

T. MICHAEL MORGAN, ESQ.*

Florida Bar No.: 062229

Kentucky Bar No.: 94856

MORGAN & MORGAN, P.A

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Emails: mmorgan@forthepeople.com

akelseyflowers@forthepeople.com

Admitted Pro Hac Vice